FINDINGS OF CONFORMANCE
MULTIPLE SPECIES CONSERVATION PROGRAM
For Swaim
TM 5356RPL^2, Log No. 04-14-005

August 17, 2006

I. Introduction

The Swaim subdivision is a nine-unit residential development of a 4.54-acre parcel. The project is located at 9288 Adlai Road in the Lakeside Community Planning area within the Metro-Lakeside-Jamul segment of the County of San Diego's Multiple Species Conservation Program (MSCP). Project development will consist of a cul-de-sac road bisecting the property with three lots north and south of the road and three lots at the western end of the road.

Biological resources on-site are identified in the biology report prepared by Pacific Southwest Biological Services, Inc. In summary, the site supports four habitat types: Eucalyptus woodland (0.78 acres); Disturbed habitat (0.19 acres); Diegan coastal sage scrub (2.82 acres); and Non-native grasslands (0.75 acres). Surveys were performed in 2004 for the California gnatcatcher. The survey results were negative. No other sensitive plant or narrow endemic species were observed on-site. One sensitive animal species, the Orange throated whiptail, was observed off-site adjacent to the property and is expected to occur on-site. An ephemeral drainage crosses the site north to south on the eastern side of the property through the Eucalyptus woodland. The drainage is completely underground within culverts north of the site. This drainage does not qualify as a County Resource Protection Ordinance (RPO) wetland but is considered an Army Corps of Engineer (ACOE) water of the United States (WoUS) and California Department of Fish and Game (CDFG) wetland.

Surrounding the site, residential development occupies the entire length of the northern property line and east of the site across Adlai Road. Three large estate residential lots, one with active cattle grazing, occur to the south. The western property line borders open space preserved within the MSCP's Lakeside Archipelago, which is a pre-approved mitigation area (PAMA) of the MSCP. The preserved PAMA land continues to the north and northeast towards Lake Jennings. The PAMA also extends onto the project site. Therefore, the site is a biological resource core area (BRCA). The on-site PAMA represents a peninsular projection of the regional linkage over the Coastal sage scrub found primarily on the western side of the site. Because of surrounding residential development and the disturbed nature of the site, the PAMA has limited functionality as part of the regional MSCP linkage.

The proposed development will impact 2.61 acres of Coastal sage scrub, 0.70 acres of Non-native grasslands, 0.78 acres of Eucalyptus woodlands, and 0.19 acres of Disturbed habitat. In addition, the drainage crossing the site will be placed within underground culverts. Project mitigation will result in the preservation of 3.91 acres of Coastal sage scrub and 0.35 acres of Non-native grasslands or equivalent Tier II and III habitat credits. Mitigation for direct and indirect impacts shall be met through the off-site purchase of 3.70 acres of Coastal sage scrub and 0.30 acres of Non-native grasslands, the on-site dedication of a 50-foot biological buffer (0.21 acres of sage scrub and 0.05 acres of grasslands), the on-site dedication of a100-foot limited building zone, breeding season avoidance for the California gnatcatcher, a temporary noise wall during grading, temporary and permanent fencing, and open space signs. Permits from the Regional Water Quality Control Board (RWQCB), ACOE and CDFG will be required prior to project approval. Mitigation for wetland impacts will be determined by the respective agency. In addition, the on-site easements will protect the off-site preserved PAMA lands from project and future residential encroachment. Please refer to the Mitigated Negative Declaration, CEQA Initial Study, and Biological Resources Report for more information.

Table 1. Impacts to Habitat and Required Mitigation

Habitat Type	Tier Level	Existing On-site (ac.)	Proposed Impacts (ac.)	Mitigation Ratio	Required Mitigation
Coastal sage scrub (CSS)	II	2.82	2.61	1.5:1	3.91
Non-native grasslands (NNG)	III	0.75	0.70	½:1	0.35
Eucalyptus woodlands	IV	0.78	0.78	--	--
Disturbed	IV	0.19	0.19	--	--
Total:	--	4.54	4.28	--	4.26*

*On-site credit of 0.21 acres of CSS and 0.05 acres of NNG reduces total to 4.00 acres off-site.

The findings contained within this document are based on County records, staff field site visits and the biological resources report. The information contained within these Findings is correct to the best of staff's knowledge at the time the findings were completed. Any subsequent environmental review completed due to changes in the proposed project or changes in circumstance shall need to have new findings completed based on the environmental conditions at that time.

The project has been found to conform to the County's MSCP Subarea Plan, the Biological Mitigation Ordinance (BMO) and the Implementation Agreement between the County of San Diego, the CDFG and the USFWS. Third Party Beneficiary Status and the associated take authorization for incidental impacts to sensitive species (pursuant to the County's Section 10 Permit under the Endangered Species Act) shall be conveyed only after the project has been approved by the County,

these MSCP Findings are adopted by the hearing body and all MSCP-related conditions placed on the project have been satisfied.

II. Biological Resource Core Area Determination

The impact area and the mitigation site shall be evaluated to determine if either or both sites qualify as a Biological Resource Core Area (BRCA) pursuant to the BMO, Section 86.506(a)(1).

A. Report the factual determination as to whether the proposed Impact Area qualifies as a BRCA. The Impact Area shall refer only to that area within which project-related disturbance is proposed, including any on and/or off-site impacts.

A portion of the site is located within the Lakeside Archipelago, which is a MSCP PAMA. As part of the PAMA, the site is a BRCA.

B. Report the factual determination as to whether the Mitigation Site qualifies as a BRCA.

Mitigation shall occur both on-site and within a County approved mitigation bank in the MSCP. Therefore, mitigation will occur within a BRCA. As a BRCA, the on-site open space resulting from this project is considered part of the regional MSCP preserve system. As such, all of the requirements relating to the "Preserve" outlined in the County's Subarea Plan, the Implementation Agreement and the Final MSCP Plan apply to this open space.

III. Biological Mitigation Ordinance Findings

A. Project Design Criteria (Section 86.505[a])

The following findings in support of Project Design Criteria, including Attachments G and H (if applicable), must be completed for all projects that propose impacts to Critical Populations of Sensitive Plant Species (Attachment C), Significant Populations of Narrow Endemic Animal Species (Attachment D), Narrow Endemic Plant Species (Attachment E) or Sensitive Plants (San Diego County Rare Plant List) or proposes impacts within a Biological Resource Core Area.

1. Project development shall be sited in areas to minimize impact to habitat.

The proposed project site is a narrow, rectangular parcel oriented east to west. With an east-facing slope, the site gradually rises from 638 feet to 650 feet in elevation until approximately 500 feet west of Adlai Road where the slope quickly climbs from 650 feet to over 760 feet in less than a 300-foot distance. The steeper slopes are covered with relatively undisturbed Coastal sage scrub. Coastal sage scrub also follows the northern property edge and occurs in patches mixed with Disturbed and Non-native grassland areas between the steeper slope and Eucalyptus woodland. Small patches of Coastal sage scrub and Non-native grasslands are also adjacent to Adlai Road. Separating the areas of Sage scrub-grassland habitats is a Eucalyptus woodland bisected by a small drainage that starts from a stormwater outflow in the development on the north side of the project site. From Adlai Road to the upturn in elevation, local residents have used the site as a BMX/motocross track.

The project has been sited in the impacted and non-native habitat areas adjacent to higher density residential development and agricultural land uses. Although impacts will occur to coastal sage scrub and non-native grasslands that require mitigation, these impacts will affect low quality habitat. Therefore, the project has minimized impacts to high quality habitat and natural features by placing development within the disturbed, low quality areas.

2. Clustering to the maximum extent permitted by County regulations shall be considered where necessary as a means of achieving avoidance.

Clustering was not used as a mechanism to avoid sensitive resources with this project. However, development will occur within the low quality native habitats, disturbed areas, and eucalyptus woodland thereby not impacting the high quality coastal sage scrub on the western side of the property.

3. Notwithstanding the requirements of the slope encroachment regulations contained within the Resource Protection Ordinance, effective October 10, 1991, projects shall be allowed to utilize design that may encroach into steep slopes to avoid impacts to habitat.

Encroachment into steep slopes to avoid some biological resources would impact the highest quality habitats on-site. The project location has not used steep slope encroachment to avoid resources. Instead, the project has been sited to develop the low quality, disturbed, and non-native habitats while preserving the high quality areas.

4. The County shall consider reduction in road standards to the maximum extent consistent with public safety considerations.

A private cul-de-sac road approximately 500 feet in length has been proposed to serve the residential units. This road meets the requirements of the local fire jurisdiction and County Department of Public Works, and cannot be further reduced in width. However, further reduction in road width would not result in a lessening of project impacts as the project has been placed to not impact the most sensitive resources.

5. Projects shall be required to comply with applicable design criteria in the County MSCP Subarea Plan, attached hereto as Attachment G (Preserve Design Criteria) and Attachment H (Design Criteria for Linkages and Corridors).

The project complies with design criteria as described in Attachment G and Attachment H. The County Subarea Plan findings are included.

B. Preserve Design Criteria (Attachment G)

In order to ensure the overall goals for the conservation of critical core and linkage areas are met, the findings contained within Attachment G shall be required for all projects located within Pre-Approved Mitigation Areas or areas designated as Preserved as identified on the Subarea Plan Map.

1. Acknowledge the "no net loss" of wetlands standard that individual projects must meet to satisfy State and Federal wetland goals, policies, and standards, and implement applicable County ordinances with regard to wetland mitigation.

A drainage flows north to south across the property through the eucalyptus woodland. The drainage is not a County jurisdictional wetland as defined by the Resource Protection Ordinance. The

drainage has been identified as an ACOE and CDFG drainage. The drainage begins on the site's northern property edge from a stormwater outflow pipe. The proposal is to continue this pipe across the project and remove the above surface drainage. Impacts will total 0.02 acres (220 feet in length and 3-4 feet in width). The County of San Diego will condition the project to provide evidence that RWQCB, ACOE and CDFG permits have been obtained or are not necessary. Impacts to this drainage will be assessed by these responsible agencies and mitigation incorporated as required. Therefore, the project will comply with the no-net-loss of wetland habitat.

2. Include measures to maximize the habitat structural diversity of conserved habitat areas, including conservation of unique habitats and habitat features.

Project mitigation will preserve a steep east-facing slope covered with high quality coastal sage scrub adjacent to existing open space in the Lakeside Archipelago. The on-site open space also preserves significant rock formations that may provide suitable habitat for small reptiles. Additional preservation of a 100-foot LBZ, temporary noise wall, fencing, signs and California gnatcatcher breeding season avoidance will contribute to the protection and conservation of the biological open space both on and off-site. Off-site purchase of 3.70 acres of Tier II and 0.30 acres of Tier III or higher habitat credits will also occur within an approved mitigation bank in the MSCP. Therefore, this project has maximized the conservation of unique features and habitats.

3. Provide for the conservation of spatially representative examples of extensive patches of Coastal sage scrub and other habitat types that were ranked as having high and very high biological value by the MSCP habitat evaluation model.

A total of 0.21 acres of coastal sage scrub and 0.05 acres of Non-native grassland will be preserved on-site. This acreage is high quality sage scrub adjacent to existing biological open space in the Lakeside Archipelago. Its conservation will contribute to the assembly of the archipelago system within the MSCP, which is a key north to south linkage for dispersing and nesting California gnatcatchers. Although 0.26 acres will be preserved, project development will impact 2.61 acres of Coastal sage scrub and 0.70 acres of Non-native grasslands. These impacts occur within

habitats indirectly impacted by surround residential development and directly impacted by recreational uses that have removed or thinned the Coastal sage scrub into small patches of habitat. Therefore, the project has restricted impacts to low quality habitat areas while preserving high quality coastal sage scrub and grasslands.

4. **Create significant blocks of habitat to reduce edge effects and maximize the ratio of surface area to the perimeter of conserved habitats. Subsequently, using criteria set out in Chapter 6, Section 6.2.3 of the MSCP Plan, potential impacts from new development on biological resources within the preserve that should be considered in the design of any project include access, non-native predators, non-native species, illumination, drain water (point source), urban runoff (non-point source) and noise.**

The project site totals 4.54 acres. The total Coastal sage scrub and Non-native grasslands on-site is 3.57 acres. Preservation of all 3.57 acres would not represent a significant block of Coastal sage scrub in this area because of edge effects from surrounding development and unpermitted recreational activities by neighboring residents. However, the project will preserve high-quality Coastal sage scrub adjacent to an existing 11.77-acre open space owned by the County of San Diego. As part of the Lakeside Archipelago, this amount of habitat represents a significant block of Coastal sage scrub for the preservation and long-term recovery of the California gnatcatcher. In addition, the project site is approximately 2,000 feet to the southeast of 50+ acres owned by the Center for Natural Lands Management. In combination with the County preserved land, the on-site open space will create a larger block of habitat that will further contribute to a reduction in edge effects. The location of project development will also have a less than significant effect regarding stormwater run-off and nighttime lighting impacts because the project is sited approximately 80 feet below the proposed open space. Additional measures to protect the open space include the dedication of a 100-foot LBZ, temporary noise wall, fencing, signs and California gnatcatcher breeding season avoidance. With all of these measures implemented, this finding has been met.

5. Provide incentives for development in the least sensitive habitat areas.

6. Development is proposed in the areas that support the least sensitive habitat. Therefore, development within these areas will reduce the amount of required mitigation and preserve sensitive biological resources.

7. Minimize impacts to narrow endemic species and avoid impacts to core populations of narrow endemic species.

No narrow endemics were observed during biological surveys by Pacific Southwest Biological Services or County staff.

8. Preserve the biological integrity of linkages between BRCAs.

The project site is located within the Lakeside Archipelago PAMA, which is a series of habitat patches that form a north to south linkage within the MSCP. The archipelago's primary purpose is a habitat linkage for nesting and dispersing California gnatcatchers. As part of the PAMA assemblage, the project site is a BRCA that represents a finger-like PAMA projection extending eastward between residential developments. Although 2.82 acres of Coastal sage scrub occurs on-site that could contribute to the linkage, much of it is impacted by indirect edge effects and neighboring residents use the site for recreation. The proposed open space design was developed to account for the high-quality Coastal sage scrub and preserve this habitat in conjunction with the off-site open space. In this regard, the project will contribute to the assembly of the MSCP linkage in this area and preserve connectivity between BRCAs.

9. Achieve the conservation goals for covered species and habitats (refer to Table 3-5 of the MSCP Plan).

No narrow endemic, MSCP covered, or state and federal listed species occur on-site. Survey results for the California gnatcatcher were negative. However, the California gnatcatcher occurs within the Lakeside Archipelago. Therefore, the project will dedicate the high-quality Coastal sage scrub as biological open space. This will contribute to the assembly the MSCP preserve and the long-term recovery and survival of this species.

C. Design Criteria for Linkages and Corridors (Attachment H)

For project sites located within a regional linkage and/or that support one or more potential local corridors, the following findings shall be required to protect the biological value of these resources:

1. Habitat linkages as defined by the BMO, rather than just corridors, will be maintained.

The Lakeside Archipelago, as the name implies, is a series of habitat patches designed as a linkage for California gnatcatcher movement. The patch nature of the linkage will not always meet the linkage and corridor width guidelines established for other MSCP PAMA. The current project represents one of these situations. At 4.54 acres in total size, the linkage on-site measures 220 feet across (north-south) and 800+ feet wide (east-west). Much of this PAMA is crossed by disturbed areas and is bordered by development and non-native vegetation. Although small in scale (50 feet by 220 feet), the proposed open space on the western side of the site will contribute to the assembly of a linkage through the Lakeside Archipelago by adding to the existing 11.77 acres of County owned open space. Therefore, habitat linkages will be maintained through a contribution to an existing preserve area.

2. Existing movement corridors within linkages will be identified and maintained.

The entire Lakeside Archipelago is a movement corridor for California gnatcatcher. As part of this corridor, the project site has limited functionality because the majority of Coastal sage scrub habitat is of low quality due to surrounding residential development. Species such as the California gnatcatcher moving onto the site may lose visual line of site to other habitat areas suitable for dispersal. This site therefore represents a one-way in and out scenario for the primary species protected by the Lakeside Archipelago. The property's west side does not have the same level of development pressure. There are few residential impacts and the adjacent property to the west is preserved and owned by the County of San Diego. Therefore, preservation of this high-quality Coastal sage scrub in addition to the existing off-site open space will contribute to the assembly of the preserve and maintain a movement corridor.

3. Corridors with good vegetative and/or topographic cover will be protected.

The proposed open space is located at an elevation above the surrounding residential developments and is comprised of high-quality Coastal sage scrub with several prominent rock outcroppings. In addition, 11.77 acres of Coastal sage scrub is already preserved adjacent to the project's proposed open space. Therefore, a corridor with good topographic features, rock outcroppings and high-quality habitat will be protected.

4. Regional linkages that accommodate travel for a wide range of wildlife species, especially those linkages that support resident populations of wildlife, will be selected.

Due to its patchy framework, the Lakeside Archipelago will not function as a movement corridor for small or large mammals, reptiles, or amphibians. Its primary function is as a California gnatcatcher movement linkage. Other avian species may also benefit from the linkage. Towards preserving this linkage, the project has proposed the addition of 0.21 acres of high-quality Coastal sage scrub and 0.05 acres of Non-native grassland adjacent to existing off-site open space. In addition, off-site mitigation for other project impacts will occur within an approved mitigation bank in the MSCP. Therefore, the project will contribute to the assembly of the MSCP preserve system.

5. The width of a linkage will be based on the biological information for the target species, the quality of the habitat within and adjacent to the corridor, topography, and adjacent land uses. Where there is limited topographic relief, the corridor must be well vegetated and adequately buffered from adjacent development.

The project site is 4.54 acres in size, measures 220 feet (north-south) by 850 feet (east-west), and is part of a MSCP's Lakeside Archipelago PAMA. As part of the Lakeside Archipelago, the target species for this linkage is the California gnatcatcher, which has a minimum breeding season home range size of approximately 2.5 acres. The 2.82 acres of Coastal sage scrub on the project site just meets this requirement for size but disturbance and impacts reduce the functional habitat value. However, the western side of the site remains relatively undisturbed with good topographic relief, high-

quality coastal sage scrub and several rock outcroppings. Although only proposed for a 50-foot by 220-foot open space, this area will maintain connectivity with an existing 11.77-acre off-site open space. In addition, off-site purchase of 3.70 acres of Sage scrub and 0.30 acres of Non-native grasslands in a county approved mitigation bank will also contribute to preserve assembly. Therefore, project will preserve habitats that meet the requirements of MSCP targeted species.

6. **If a corridor is relatively long, it must be wide enough for animals to hide in during the day. Generally, wide linkages are better than narrow ones. If narrow corridors are unavoidable, they should be relatively short. If the minimum width of a corridor is 400 feet, it should be no longer than 500 feet. A width of greater than 1,000 feet is recommended for large mammals and birds. Corridors for bobcats, deer, and other large animals should reach rim-to-rim along drainages, especially if the topography is steep.**

   Where a primary linkage is located, a 1,000-foot width is the minimum recommendation. In local corridors, a 400-foot width (minimum) over a 500-foot length (maximum) may be considered. The Lakeside Archipelago, as the name implies, is a series of habitat patches designed as a linkage for California gnatcatcher movement. The patch nature of the linkage will not always meet the width guidelines established for other MSCP PAMA linkages and corridors. The current project represents one of these situations. At 4.54 acres in total size, the linkage on-site measures 220 feet across (north-south) and 800+ feet wide (east-west). Much of this PAMA is crossed by disturbed areas and is bordered by development and non-native vegetation. Although small in scale (50 feet by 220 feet), the proposed open space on the western side of the site will contribute to the assembly of a linkage through the Lakeside Archipelago by adding to the existing 11.77 acres of County owned open space. Therefore, habitat linkages will be maintained.

7. **Visual continuity (i.e., long lines-of-site) will be provided within movement corridors. This makes it more likely that animals will keep moving through it. Developments along the rim of a canyon used as a corridor should be set back from the canyon rim and screened to minimize their visual impact.**

The project site's proposed open space is located at the crest of an east-facing slope approximately 760-780 feet in elevation. With several rock outcroppings, high-quality Coastal sage scrub, and connectivity with off-site open space, visual continuity will be maintained within this segment of the Lakeside Archipelago.

8. **Corridors with low levels of human disturbance, especially at night, will be selected. This includes maintaining low noise levels and limiting artificial lighting.**

   The site's proposed open space is located approximately 80 feet higher in elevation than the proposed development. Coupled with a 100-foot LBZ, steep slopes, fencing, and signage, human disturbance including recreation, noise and nighttime lighting will be reduced to a less than significant impact. Therefore, the project has met these criteria.

9. **Barriers, such as roads, will be minimized. Roads that cross corridors should have ten foot high fencing that channels wildlife to underpasses located away from interchanges. The length-to-width ratio for wildlife underpasses is less than 2, although this restriction can be relaxed for underpasses with a height of greater than 30 feet.**

   There are no proposed corridor crossings. The site is surrounded by residential development on the north, east and south sides. The western side, adjacent to existing open space, will not be impacted. In addition, the project proposes open space along this property edge to contribute to the assembly of the MSCP preserve.

10. **Where possible at wildlife crossings, road bridges for vehicular traffic rather than tunnels for wildlife use will be employed. Box culverts will only be used when they can achieve the wildlife crossing/movement goals for a specific location. Crossings will be designed as follows: sound insulation materials will be provided; the substrate will be left in a natural condition, and vegetated with native vegetation if possible; a line-of-site to the other end will be provided; and if necessary, low-level illumination will be installed in the tunnel.**

    The project proposes no wildlife crossings.

11. **If continuous corridors do not exist, archipelago (or stepping-stone) corridors may be used for short distances. For**

example, the gnatcatcher may use disjunct patches of sage scrub for dispersal if the distance involved is less than 1-2 miles.

The project site is located within the MSCP's Lakeside Archipelago PAMA, which is a north to south movement linkage for California gnatcatcher. The proposed open space is adjacent to an existing 11.77 acres off-site preserve land and less than 2000 feet to the southeast of more than 50 acres of preserve land. Therefore, the project will dedicate an open space easement that contributes to the assembly of the Lakeside Archipelago PAMA.

IV. Subarea Plan Findings

Conformance with the objectives of the County Subarea Plan is demonstrated by the following findings:

1. The project will not conflict with the no-net-loss-of-wetlands standard in satisfying State and Federal wetland goals and policies.

The project site has an 880 SF drainage identified in the biology report as a CDFG and ACOE jurisdictional resource. The project is conditioned to provide evidence that 401, 404 and 1602 permits have been obtained or are not required by the responsible agencies. Mitigation for any impacts will be determined by the permitting agencies. Therefore, the project will meet the non-net-loss standard.

2. The project includes measures to maximize the habitat structural diversity of conserved habitat areas including conservation of unique habitats and habitat features.

The site's proposed open space will preserve high quality Coastal sage scrub and several rock outcroppings in an easement adjacent to 11.77 acres of preserved sage scrub. In addition, the off-site purchase of 3.70 acres of Tier II and 0.30 acres of Tier III habitats in a County approved mitigation bank in the MSCP will also conserve sensitive resources and unique habitat features. Therefore, the project has met this finding.

3. The project provides for conservation of spatially representative examples of extensive patches of Coastal sage scrub and other habitat types that were ranked as having high and very high biological values by the MSCP habitat evaluation model.

The site is mapped as very high habitat value. However, disturbed areas on-site and the patchy nature of the Coastal sage scrub are indicative of low value Coastal sage scrub at the lower elevations and high value at the higher elevations. Project development will occur within the disturbed low value areas and the high-quality Coastal sage scrub will be preserved. Therefore, the project will provide for the conservation of high value coastal sage scrub.

4. The project provides for the creation of significant blocks of habitat to reduce edge effects and maximize the ratio of surface area to the perimeter of conserved habitats.

The size of the project site and its location within the MSCP's Lakeside Archipelago preclude the creation of a significant block of habitat. However, the proposed open space, which is 50 feet by 220 feet, is located adjacent to 11.77 acres of preserved land. The dedication of habitat on-site not only preserves high quality habitat but also buffers the larger off-site open space from the residential development to the east. Therefore, the two preserved areas will create a significant block of habitat. To further reduce edge effects, the project is conditioned to dedicate a 100-foot LBZ, install temporary fencing and noise walls, permanent fencing and signs, and avoid the California gnatcatcher breeding season.

5. The project provides for the development of the least sensitive habitat areas.

Proposed development occurs within the lowest quality habitats on-site that are a patchwork of disturbed trails, Coastal sage scrub, Non-native grasslands and Eucalyptus woodlands adjacent to existing residential development.

6. The project provides for the conservation of key regional populations of covered species, and representations of sensitive habitats and their geographic sub-associations in biologically functioning units.

No MSCP covered species were identified on-site. Sensitive habitats were mapped on-site including 2.82 acres of Coastal sage scrub and 0.75 acres of Non-native grasslands. The majority of these two habitat types are considered low quality due to edge effect impacts. However, the project will protect 0.21 acres of high-quality Coastal sage scrub and 0.05 acres of Non-native grassland on-site adjacent to 11.77 acres of preserved land. In addition, the project is conditioned to purchase 3.70

acres of Tier II and 0.30 acres of Tier III habitat types respectively in a County approved bank within the MSCP. Therefore, the project will provide for the conservation of MSCP covered species.

7. Conserves large interconnecting blocks of habitat that contribute to the preservation of wide-ranging species such as Mule deer, Golden eagle, and predators as appropriate. Special emphasis will be placed on conserving adequate foraging habitat near Golden eagle nest sites.

Due to its patchy framework, the Lakeside Archipelago will not function as a movement corridor for small or large mammals, reptiles, or amphibians. Its primary function is as a California gnatcatcher movement linkage. Other avian species may also benefit from the linkage. Towards preserving this linkage, the project has proposed the addition of 0.21 acres of high-quality coastal sage scrub and 0.05 acres of non-native grassland adjacent to existing off-site open space. In addition, off-site mitigation for other project impacts will occur within an approved mitigation bank in the MSCP. Therefore, the project will contribute to the assembly of the MSCP preserve system.

8. All projects within the San Diego County Subarea Plan shall conserve identified critical populations and narrow endemics to the levels specified in the Subarea Plan. These levels are generally no impact to the critical populations and no more than 20 percent loss of narrow endemics and specified rare and endangered plants.

No narrow endemic, MSCP covered, or state and federal listed species occur on-site. Survey results for the California gnatcatcher were negative. However, the California gnatcatcher occurs within the Lakeside Archipelago. Therefore, the project will dedicate the high-quality coastal sage scrub as biological open space. This will contribute to the assembly the MSCP preserve and the long-term recovery and survival of this species.

9. No project shall be approved which will jeopardize the possible or probable assembly of a preserve system within the Subarea Plan.

The MSCP PAMA extends over the majority of the site probably due to the Coastal sage scrub habitat type. As part of the Lakeside Archipelago, this PAMA may function as a north-south linkage for the California gnatcatcher. However, the site is constrained by surrounding development. The majority of the Coastal sage scrub is low quality and could not be restored to function as higher quality habitat. In addition, the

low elevation of the eastern portion of the site relative to the surrounding development results in poor visual line of site for dispersing California gnatcatchers. The site would represent a sink for California gnatcatchers with one direction in and out. Therefore, the project will develop the low quality and low elevation areas. Preservation will occur on the higher elevation and high quality Coastal sage scrub areas where a larger block of habitat can be created with off-site open space that will maintain visual connectivity within the archipelago and contribute to the preserve assembly.

10. All projects that propose to count on-site preservation toward their mitigation responsibility must include provisions to reduce edge effects.

The project proposes to count 0.26 acres of open space on the western side as mitigation credits. To reduce edge effects, a 100-foot LBZ will be dedicated adjacent to the biological open space. Most of the LBZ will also be dedicated as steep slope open space. In addition to the LBZ, a temporary noise wall will be constructed to reduce grading noise impacts. Fencing, permanent and temporary, along with signs will demarcate the open space boundary to reduce human encroachment. The entire project will be restricted from brushing, clearing and/or grading during the California gnatcatcher breeding season from March 1 through August 15. Therefore, the edge effect impacts will be less than significant.

11. Every effort has been made to avoid impacts to BRCAs, to sensitive resources, and to specific sensitive species as defined in the BMO.

Site development will impact 2.61 acres of low quality Coastal sage scrub and 0.70 acres of Non-native grasslands in addition to developing the disturbed areas and Eucalyptus woodland habitat. No impacts will occur to any sensitive, covered, narrow endemic, or state and federal listed species through project development. Overall, the development footprint is located to not impact the high quality Coastal sage scrub on the western side of the site. This Coastal sage scrub (0.21 acres) will be preserved in open space along with 0.05 acres of Non-native grasslands. The open space is adjacent to off-site preserved land and will contribute to the preserve assembly within the Lakeside Archipelago. Off-site mitigation will require the purchase of 3.70 acres of Tier II and 0.30 acres of Tier III habitat credits or higher in an approved mitigation bank in the MSCP. Therefore, the project will have avoided impacts to the high value habitat within a BRCA, will mitigate off-site for impacts to low quality habitat types, will not impact sensitive species as defined by the BMO, and will contribute to the over goals of the MSCP.

Greg Krzys, Department of Planning and Land Use
August 17, 2006

MSCP Designation For
Dean
TM 5356, ER 04-14-005

- Streets
- Freeways
- Parcels
- Lakes
- Rivers
- Creeks
- Major Amend Area
- Minor Amend Area
- MSCP PAMA
- Take Authorized Areas
- Planned Preserve